

## **ATTACHMENT “B”-STATEMENT OF BASIS**

**Commonwealth of Kentucky**  
**Division for Air Quality**  
***PERMIT STATEMENT OF BASIS***

TITLE V DRAFT PERMIT NO. V-01-013  
GREEN TOKAI COMPANY  
1725 DOWNING DRIVE, MAYSVILLE, KENTUCKY  
DECEMBER 4, 2001  
FROUGH SHERWANI, REVIEWER  
PLANT I.D. # 021-161-00035  
APPLICATION LOG # 53537

**SOURCE DESCRIPTION:**

Green Tokai Company located at Maysville, Kentucky, manufactures weather strip for the automobile. The manufacturing process includes plastic extrusion, flocking adhesive, cleaning, and finishing operations.

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<b>Emission Point:</b>	<b>01</b>	<b>Extrusion Line # 1</b>
	<b>MP1</b>	<b>Adhesive1</b>
	<b>MP2</b>	<b>Flocking Adhesive</b>
	<b>MP3</b>	<b>Adhesive 2</b>
	<b>MP4</b>	<b>Cleaning</b>

**MP1**

This emission point is for adhesive application. The consumption of material is 0.552 lbs. per hr.

**MP2**

This emission point is for flocking adhesive application. The consumption of material is 4.07 lbs. per hr.

**MP3**

This emission point is for flocking adhesive application. The consumption of material is 2.15 lbs. per hr.

**MP4**

This emission point is for cleaning process. The consumption of material is 0.2812 gal per hr. The 98% cleaning material is recycled. The "PTE" is calculated for 8760 hrs per year.

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<b>Emission Point:</b>	<b>02</b>	<b>Extrusion Line # 2</b>
	<b>MP1</b>	<b>Adhesive1</b>
	<b>MP2</b>	<b>Adhesive2</b>
	<b>MP3</b>	<b>Flocking Adhesive</b>
	<b>MP4</b>	<b>Adhesive 3</b>
	<b>MP5</b>	<b>Cleaning</b>

**MP1**

This emission point is for adhesive application. The consumption of material is 4.922 lbs per hr.

**MP2**

This emission point is for adhesive application. The consumption of material is 0.127 lbs. per hr.

**MP3**

This emission point is for flocking adhesive application. The consumption of material is 1.81 lbs. per hr.

**MP4**

This emission point is for adhesive application. The consumption of material is 1.03 lbs per hr.

**MP5**

This emission point is for cleaning process. The consumption of material is 0.2812 gal per hr. The 98% cleaning material is recycled.

The "PTE" is calculated for 8760 hrs per year.

<b>Emission Point:</b>	<b>03</b>	<b>Extrusion Line # 3</b>
	<b>MP1</b>	<b>Adhesive1</b>
	<b>MP2</b>	<b>Flocking Adhesive</b>
	<b>MP3</b>	<b>Adhesive 2</b>
	<b>MP4</b>	<b>Cleaning</b>

**MP1**

This emission point is for adhesive application. The consumption of material is 0.859 lbs per hr.

**MP2**

This emission point is for adhesive application. The consumption of material is 2.21 lbs. per hr.

**MP3**

This emission point is for flocking adhesive application. The consumption of material is 0.59 lbs. per hr.

**MP4**

This emission point is for cleaning process. The consumption of material is 0.2812 gal per hr. The 98% cleaning material is recycled.

The “PTE” is calculated for 8760 hrs per year.

**Emission Point:                      04                      Extrusion Line # 4**

<b>MP1</b>	<b>Adhesive1</b>
<b>MP2</b>	<b>Adhesive2</b>
<b>MP3</b>	<b>Flocking Adhesive</b>
<b>MP4</b>	<b>Adhesive 3</b>
<b>MP5</b>	<b>Cleaning</b>

**MP1**

This emission point is for adhesive application. The consumption of material is 4.43 lbs per hr.

**MP2**

This emission point is for adhesive application. The consumption of material is 1.76 lbs. per hr.

**MP3**

This emission point is for flocking adhesive application. The consumption of material is 1.66 lbs. per hr.

**MP4**

This emission point is for adhesive application. The consumption of material is 0.127 lbs per hr.

**MP5**

This emission point is for cleaning process. The consumption of material is 0.2812 gal per hr. The 98% cleaning material is recycled.

The “PTE” is calculated for 8760 hrs per year.

**Emission Point:                      05:                      Extrusion Line # 5**

<b>MP1</b>	<b>Adhesive</b>
<b>MP2</b>	<b>Cleaning</b>

**MP1**

This emission point is for adhesive application. The consumption of material is 0.123 lbs. per hr.

**MP2**

This emission point is for cleaning process. The consumption of material is 0.0132 gal per hr. The 98% cleaning material is recycled. The “PTE” is calculated for 8760 hrs per year.

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**Emission Point:                      06:                      Finishing Operations**

This is a insignificant activity.

**COMMENTS:**

**Type of control and efficiency:**

There is no control for any pollutants in facility.

**Emission factors and their source:**

Mass balance is used for the emission factors for VOC and HAPS.

**Applicable regulation:**

State regulation 401 KAR 52:020 Title V permits.

**EMISSION AND OPERATING CAPS DESCRIPTION:**

The source has accepted VOC emission 90 tons per year to preclude 401 KAR 50:012. The actual VOC shall not exceed 90 tons per year. This annual limitation shall not be exceeded during any consecutive twelve months period for the entire source.

**CREDIBLE EVIDENCE:**

This permit contains provisions which require that specific test methods, monitoring or recordkeeping be used as a demonstration of compliance with permit limits. On February 24, 1997, the U.S. EPA promulgated revisions to the following federal regulations: 40 CFR Part 51, Sec. 51.212; 40 CFR Part 52, Sec. 52.12; 40 CFR Part 52, Sec. 52.30; 40 CFR Part 60, Sec. 60.11 and 40 CFR Part 61, Sec. 61.12, that allow the use of credible evidence to establish compliance with applicable requirements. At the issuance of this permit, Kentucky has not incorporated these provisions in its air quality regulations.